AO 91 (Rev. 11/11) Criminal Col	•			
Southern District of Texas FILED	UNITED STATE	ES DISTRICT CO	URT	
AUG 2 0 2020		for the		
Southern District of Texas				
David J. Bradley, Cler	tes of America	. \		
Officed Sta	v.)		
) Case No. M-	20-1587-M	
	a BELLAND)		
Y.O.B: 1976 Citiz	enship: United States)		
		.)		
Def	endant(s)	,		
	CRIMINA	AL COMPLAINT		
I, the complainar	nt in this case, state that the fol	lowing is true to the best of	my knowledge and belie	f.
On or about the date(s) o	f August 19, 2020	in the county of	Hidalgo	in the
Southern Distri	ct of Texas	, the defendant(s) violated:		
Code Section		Offense Descr	iption	
	Knowingly and	l intentionally import into the	· United States from the U	Inited
21 USC § 952 Mexican States approximately 16.88 kilograms of cocaine a Schedule II controlled substance, and did knowingly and intentionally possess with the				
21 USC § 841	intent to distrib controlled subs	oute approximately 16.88 kilo	ograms of cocaine a Sch	edule II
. ←				
This criminal con	mplaint is based on these facts	:		
	ized by AUSA J. Sturgis	•		
Continued on the	attached sheet and made par			
Submitted by reliable cause for	able electronic means, sworn t	to and attested to telephonic	ally per Fed. R. Cr. 4.1, a	ind
probable cause in	Juna on.			
Continued on	the attached sheet.			
Continued on	the attached sheet.	-		
			/s/ J. Michael Salinas	
Sworn to and executed by reliable electronic means, sworn to Printed name and title and attested telephonically per		orn	Complainant's signature	
		J. Micha	J. Michael Salinas / HSI Special Agent	
FED.R.CR.4.1, and probat cause found on:	ole		Printed name and title	
Sworn to before me and	signed in my presence			
1 ,	20-7:47 a.4.		110)	
Date: -08/19/202	0 - /- / / a.m.	Xuus 1	1. Can	
Date	-	-/-/	Judge's signature	
City and state:	McAllen, Texas	Juan F.	Alanis, U.S. Magistrate	Judae
Ony and State.			Printed name and title	

Attachment "A"

On August 19, 2020, Veronica BELLAND, a United States Citizen, applied for admission into the United States at the Anzalduas Port of Entry (POE) in Mission, Texas. BELLAND was operating a red in color Ford Edge and was referred for a secondary inspection due to a primary lookout on the vehicle indicating the possible presence of anomalies during a previous entry into the United States.

During the secondary inspection, a Customs and Border Protection (CBP) K9 alerted to the odor of narcotics emitting from the vehicle. A subsequent x-ray scan revealed anomalies in the center console of the vehicle and a manual inspection produced fifteen (15) packages concealed under the center console which contained a white powdery substance that field tested positive for the properties of cocaine. The packages were extracted from the vehicle and contained a total of 16.88 kilograms of cocaine.

Homeland Security Investigations (HSI) Special Agent (SA) Joe Michael Salinas responded to the Anzalduas POE for investigative assistance and conducted an interview of BELLAND. During the interview, BELLAND admitted to knowledge that she was transporting illegal drugs into the United States from Mexico and stated that she believed the vehicle contained cocaine. BELLAND stated that she was going to be paid \$2,500 in U.S. currency for the trip and estimated that she had made approximately five (5) or six (6) prior successful trips where she transported a drug laden vehicle into the United States from Mexico.